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July 14, 2021

Honorable Margo K. Brodie
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday ("Hlday") is currently scheduled for a sentencing hearing before the Court on July 27, 2021. Unfortunately, Hlday was recently [REDACTED] [REDACTED] [REDACTED] report confirming [REDACTED] provided to the government. Naturally, [REDACTED] have preoccupied defendant. Additionally, the defense is still gathering documents, including letters of support, that will be included in Hlday's sentencing memorandum. For these reasons, Hlday respectfully request an adjournment for approximately sixty days to a date convenient to the Court to allow him to address the [REDACTED] and to collect documents necessary for sentencing. Because of the [REDACTED] the government, by Assistant United States Attorney Mark Bini, consents to this application.

Thank you for Your Honor's consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Sarah Evans (by ECF)
AUSA Mark Bini (by ECF)